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12 James W. Breyer, Sarah Friar, Mark Garrett,
Charles J. Robel and Model N, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

17 PLYMOUTH COUNTY RETIREMENT
18 SYSTEM, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

V.

21 MODEL N, INC., ZACK RINAT, SUJAN JAIN,
22 JAMES W. BREYER, SARAH FRIAR, MARK
23 GARRETT, CHARLES J. ROBEL, J.P.
24 MORGAN SECURITIES LLC, DEUTSCHE
25 BANK SECURITIES INC., STIFEL,
NICOLAUS & COMPANY, INCORPORATED,
PACIFIC CREST SECURITIES LLC, PIPER
JAFFRAY & CO., RAYMOND JAMES &
ASSOCIATES, INC. and DOES 1-25, inclusive.

Defendants.

Case No. C 14-04516 WHO

CLASS ACTION

**JOINT STIPULATION AND ORDER
CONTINUING HEARING ON MOTION
TO REMAND AND REVISING
BRIEFING SCHEDULE**

DATE ACTION FILED: 9/5/14
(Removed 10/8/14)

1 WHEREAS, on November 5, 2014, Plaintiff Plymouth County Retirement System filed a
2 Notice of Motion and Motion to Remand and a Memorandum of Points and Authorities in
3 Support Thereof (the "Motion");

4 WHEREAS, by stipulation by the Parties pursuant to Civil L.R. 6-1(a), Defendants are not
5 required to respond to existing complaints until after the Motion is decided and Plaintiff files an
6 amended complaint;

7 WHEREAS, by stipulation by the Parties pursuant to Civil L.R. 6-1(a), Defendants will
8 respond to Plaintiff's amended complaint within 60 days after service;

9 WHEREAS, by stipulation by the Parties pursuant to Civil L.R. 6-1(a), if Defendants file
10 any motions directed at the amended complaint, the opposition and reply briefs shall be filed
11 within 60 days and 30 days, respectively, of that response;

12 WHEREAS, pursuant to Civil Local Rule 7-3(a), Defendants' Response to Plaintiff's
13 Motion must be filed by November 19, 2014;

14 WHEREAS, pursuant to Civil Local Rule 7-3(c), Plaintiff's Reply in support of Plaintiff's
15 Motion must be filed by November 26, 2014;

16 WHEREAS, the Motion is currently noticed for hearing on Wednesday, December 17,
17 2014, at 2:00 p.m.;

18 WHEREAS, counsel for the Parties have conferred regarding the briefing schedule on the
19 Motion, and Defendants have requested a modification of the current briefing schedule due to the
20 complexity of issues pertaining to the Motion and the schedules of counsel, and Plaintiff does not
21 object to such modification;

22 WHEREAS, no other dates will be affected by this Stipulation if approved by the Court;

23 NOW, THEREFORE, in consideration of the foregoing, and pursuant to Civil L.R. 6-2(a),
24 the parties stipulate, and the Court hereby orders, as follows:

- 25 1. Defendants' Response to Plaintiff's Motion to Remand must be filed no later than
26 December 3, 2014;
27 2. Plaintiff's Reply in Support of the Motion to Remand must be filed no later than
December 17, 2014;
28 3. The hearing on Plaintiff's Motion to Remand will be continued to Wednesday,
January 7, 2015, at 2:00 p.m.

1 DATED: November 11, 2014

ROBBINS GELLER RUDMAN & DOWD
LLP

2 CHRISTOPHER P. SEEFER

3 /s/ Christopher P. Seefer

4 CHRISTOPHER P. SEEFER

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10 Attorney for Plaintiff Plymouth County
11 Retirement System

12 DATED: November 11, 2014

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15 /s/ Susan S. Muck

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1 DATED: November 11, 2014

SIDLEY AUSTIN LLP
NORMAN J. BLEARS

3 /s/ Norman J. Blears

4 NORMAN J. BLEARS

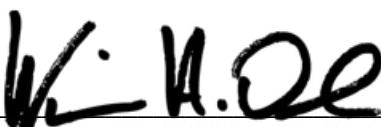
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15 Associates, Inc.

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17 ATTORNEYS AT LAW
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1 PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.
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4 DATED: November 12, 2014
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Honorable William H. Orrick
United States District Judge

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